

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## **REGION 4**

345 COURTLAND STREET, N.E. ATLANTA, GEORGIA 30365

· JUL 0 8 1996

4WD-SSRB

OVERNIGHT MAIL

Mr. R. Vyas Corporate Manager Environmental Remediation Witco Corporation One American Lane Greenwich, CT 06831-2559

SUBJ: Stauffer (LeMoyne Plant) Superfund Site

Axis, Alabama Operable Unit #2

Dear Mr. Vyas:

On June 25, 1996, the United States Environmental Protection Agency's (EPA's) Health Risk Superfund Technical Support Center (STSC) revised their provisional RfD for the toxicity of thiocyanate at the Stauffer (LeMoyne Plant) Superfund Site (see enclosure).

Based upon Witco's submittal relating to the Lijinki study, EPA has determined 128 mg/kg/day to be a LOAEL for thiocyanate. Applying a total uncertainty factor of 1,000 (3 for use of a minimal LOAEL, 10 for extrapolation from animals, 10 for human sensitive subpopulations, 3 for database deficiencies) to the LOAEL of 128 mg/kg/day results in a provisional RfD of 1E-1 mg/kg/day (rounded to the nearest one). Since this value is significantly different from the current cyanide based RfD in the 1990 Record of Decision, and from previous provisional RfDs for thiocyanate from STSC, the Region is modifying the RfD and resulting groundwater and subsurface soil remediation goal for the Stauffer (LeMoyne Plant) Superfund Site. The modified groundwater remediation goal, based upon the new RfD, is 3500 ug/L, and the modified subsurface clean up standard, based upon protection of groundwater, is 8.5 mg/kg of thiocyanate.

Since the Witco submittal regarding the analytical techniques for thiocyanate and cyanide did not prove that cyanide was absolutely absent at the Site, either in groundwater or soil, the established remediation goals for cyanide will be retained for the Feasibility Study and Record of Decision. If future monitoring, on a long term basis, shows to EPA's satisfaction,

that cyanide is not present at the Site, Witco may again petition EPA to remove the requirement for monitoring cyanide. EPA is in agreement with Witco that the proposed Ion Chromatography method is the most appropriate for analyzing thiocyanate and cyanide. Therefore, from this time forward, all analytical methods for thiocyanate and cyanide at the Stauffer (LeMoyne Plant) Superfund Site shall follow the Ion Chromatography method set out in Witco's February 1996 submittal.

If you have any questions on this matter, please call Joanne Benante at 404-347-3555 extension 6234.

Sincerely,

Elmer Akin

Regional Risk Assessor Waste Management Division

W. Ohn

Jeanne Benante

Remedial Project Manager South Superfund Remedial

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